

AFFIDAVIT

Your Affiant, Stephen McGrath, deposes and states:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, & Explosives (ATF), and have been since April 11, 2021; graduating from the Federal Law Enforcement Training Center Criminal Investigator training and the ATF National Academy in November of 2021. Previous to this position, I served as an ATF Task Force Officer from July of 2018 until April of 2021. Prior to and while serving as a Task Force Officer with ATF, I was employed by the City of Cleveland, Ohio for approximately 8 years. I served the City of Cleveland Division of Police (herein after "CDP") as a Basic Patrolman, a Detective with the CDP Gang Impact Unit, and as a Sergeant supervising the CDP Gang Impact Unit/ Operation Legend Task Force. Formalized education prior to law enforcement includes advanced degrees of Bachelor's in Science of Business Administration and a Master's of International Business Administration. I have participated and investigated numerous state and federal firearms investigations. Pursuant to 18 U.S.C. § 3051, I am empowered to enforce criminal laws of the United States. As result of training and experience, I am familiar with federal laws including Title 18, United States Code, § 922(a)(1)(A) Engaging in the Business of Dealing Firearms without a License; Title 18, United States Code, § 922(a)(6), False Statement in the Acquisition of a Firearm; and Title 18, United States Code, § 933, Trafficking in Firearms.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18, United States Code, § 922(a)(1)(A) Engaging in the Business of Dealing Firearms without a License; Title 18, United States Code, § 922(a)(6), False Statement in Acquisition of a Firearm; and Title 18, United States Code, § 933, Trafficking in Firearms, have been committed by Willie JACKSON.

4. Beginning June 15, 2023, ATF Under Cover Agents (hereinafter referred to as UCA) have purchased 33 firearms, ammunition, and firearms parts/accessories from Willie JACKSON. ATF UCAs have met with JACKSON nine times in person and engaged in multiple conversations with JACKSON. ATF UCAs have maintained communication with JACKSON via telephone, including text messages and telephone calls, since June 15, 2023. The text message communication includes photographs of firearms JACKSON is advertising to sell; prices of firearms, ammunition, and accessories; and coordinating times and locations to meet with conduct transactions. Throughout the conversations between ATF UCAs and JACKSON, the ATF UCAs have informed JACKSON that the firearms they purchase are being transported to Mexico. JACKSON has informed ATF UCAs that he prefers to sell firearms without a license because it's easier that way. JACKSON also informed ATF UCAs on multiple occasions that he has an inventory of firearms and that he has to go to Ashtabula, Ohio, and Mentor, Ohio, to pick-up firearms.

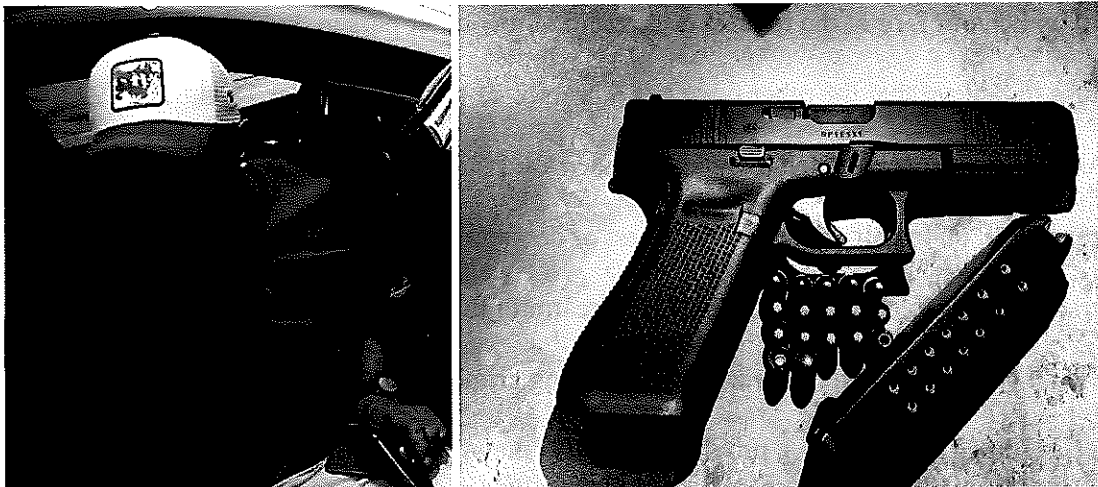
5. A query of ATF eTrace database reveals that JACKSON has had 6 firearms that he purchased recovered by law enforcement between 2018 and 2022. The time between the day of the purchases and the day the firearms were recovered by law enforcement include: 601 days recovered in Mentor, Ohio; 710 days recovered in Toledo, Ohio; 219 days recovered Cleveland, OH; 41 days recovered in New York, New York; 24 days recovered in Maple Heights, Ohio; and

194 days recovered in Toledo, Ohio. There is also a record of one multiple-sale transaction where JACKSON purchased 2 pistols from a Federally Licensed Dealer in Middleburg Heights, Ohio. ATF has used a 300-day time frame between the date of purchase and date of recovery as an indicator of Firearms Trafficking.

6. On April 1, 2022, ATF SAs had previously interviewed JACKSON regarding him being the purchaser of several crime guns. JACKSON was issued a Warning of Straw Purchasing Letter, which he signed acknowledging his knowledge of Title 18 U.S.C. § 932(b) citing that it is unlawful for any person to knowingly purchase, or conspire to purchase, a firearm for, on behalf of, or at the request or demand of any other person, knowing or having reasonable cause to believe that the other person is a prohibited transferee under 18 U.S.C. § 922(d). JACKSON also acknowledged that he understood this law forbids a person from purchasing a firearm for, on behalf of, or at the request or demand of, another person knowing that the other person intends to possess or transfer the firearm in furtherance of a Federal or State felony, Federal crime of terrorism, or a drug trafficking crime and that Federal law at 18 U.S.C. §§ 922(a)(6) and 924(a)(1)(A), provides that it is unlawful for any person to make a false statement on a Firearms Transaction Record, ATF Form 4473, when acquiring a firearm from a Federal firearms licensee.

7. On June 15, 2023, an ATF Undercover Special Agents (UCA) and a Confidential Informant (CI) met with a known black male (not named herein) to conduct a drug transaction in Cleveland, Ohio. During the transaction the known black male told the UCA and CI that he had a source of supply for firearms if the UCA was interested. The known black male contacted his source of supply and invited him to join them at the meet location in Garfield Heights. The firearms source of supply was later identified as Willie JACKSON, who met with the UCA and

CI at 12782 Rockside Rd., Garfield Hts., Ohio. The UCA and JACKSON engaged in general conversation about firearms. Subsequently JACKSON sold the UCA a Glock, 9mm semi-automatic pistol, model 17 Gen 5, bearing serial number BPSE531 for \$900. JACKSON was driving a maroon 2020 Jeep Cherokee bearing State of Ohio license plate JYL7570, which is registered to JACKSON. The UCA maintained communication with JACKSON and the known black male co-conspirator via telephone where they discussed future firearms sales. JACKSON informed the UCA's that he was in the business of selling firearms and could also make custom firearms.



8. On June 16, 2023, an ATF reliable Confidential Informant (CI)¹ and UCA met with Willie JACKSON and a co-conspirator on the east side of Cleveland, Ohio. JACKSON sold the UCA a Smith & Wesson, 5.7 caliber, semi-automatic pistol, model M&P 5.7, bearing serial number PJR3976 with ammunition for \$1700. The UCA asked JACKSON if the

¹ The CI is providing information to the ATF in exchange for payment. The CI's information has been corroborated in this investigation and others by independent means and, therefore, Affiant believes that the CI's information is reliable. The CI has at least one prior felony conviction.

ammunition was armor piercing to which JACKSON affirmatively acknowledged and added that it would go through a car door.

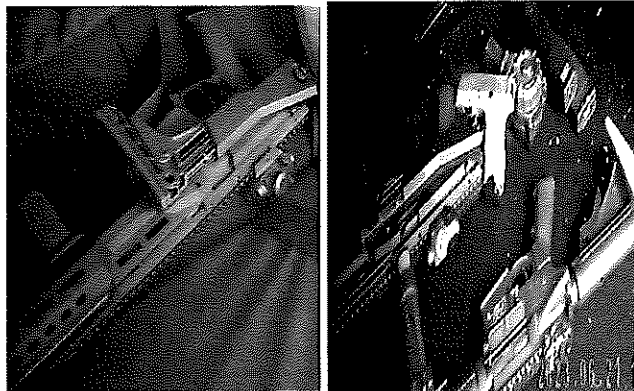


9. On June 20, 2023, an ATF UCA and CI met with JACKSON at 3273 Steelyard Dr., Cleveland, OH. JACKSON sold the ATF UCA two firearms: a Palmetto State Armory, Model Dagger Compact, 9mm pistol, serial number FG089629, and a FN Herstal, Model PS90, 5.7x28 caliber rifle, serial number FG089628 for \$3300. JACKSON and the UCA conversed about future firearms transactions to include JACKSON providing pricing and stated that he has a “deal right now” and JACKSON confirmed he would put six firearms together for the UCA.



10. On June 21, 2023, an ATF UCA and CI met with JACKSON at 3273 Steelyard Dr., Cleveland, OH. JACKSON sold the ATF UCA four firearms for \$4400. The firearms

purchased include a Smith & Wesson, Model M&P-15, no caliber listed, serial number SY12126 of which JACKSON informed the UCA that it was equipped with a drop-in and stated that it was “fully” referencing a fully automatic firearm (machine-gun); a Česká Zbrojovka a.s. (CZ), Model CZ Scorpion EVO 3 S1, 9mm-rifle, serial number D187253 of which JACKSON informed the UCA was “fully” and further informed the UCA it was the trigger that allowed the firearm to operate in such a manner (also known as binary trigger); a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42782, and a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE20051. JACKSON told the UCA that he can acquire and build silencers. The UCA asked JACKSON if he was acquiring the firearms from a store and JACKSON informed the UCA that he does not. After this transaction, ATF SA’s inspected the above-mentioned firearms of which JACKSON proclaimed to be fully-automatic and determine that they were not in fact fully automatic.



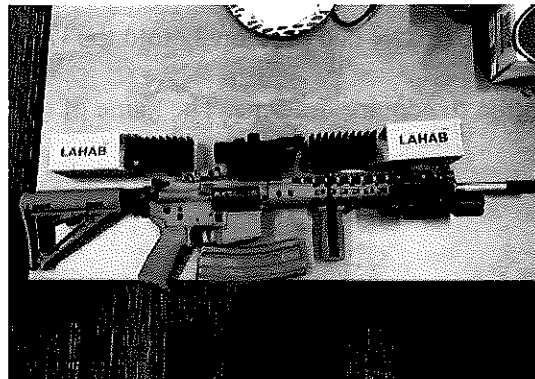
11. On June 27, 2023, an ATF UCA and CI met with JACKSON at 3273 Steelyard Dr., Cleveland, OH. JACKSON sold the ATF UCA five firearms, ammunition, and a magazine for \$4000. The firearms included: an Anderson Manufacturing, Model AM-15, multi-cal rifle, serial number 20378924; a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE69170; a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number

DEB04721; a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42735; and a Palmetto State Armory, Model Dagger Compact, 9mm-pistol, serial number JJE42786. UCA asked JACKSON how long it takes him to build the P80s and he replied "a day". JACKSON referenced ordering the firing pins and the other parts. The UCA asked JACKSON how many parts he had to order and JACKSON pointed at multiple different parts on the firearm and discussed having to order them separately.



12. On June 28, 2023, ATF SAs reviewed documents and corresponded with Palmetto Arms Chief Compliance Officer regarding the several Palmetto State Armory firearms ATF UCAs purchased from JACKSON. The Palmetto State Armory compliance officer informed ATF SAs that the subject firearms were shipped to a federally licensed firearms dealer, located in northeast Ohio. JACKSON had previously told the UCA that he had to travel to the same northeast Ohio location to acquire firearms. The name of the purchaser is known to ATF but not named herein.

13. On July 6, 2023, two ATF UCAs met with JACKSON at 3273 Steelyard Dr., Cleveland, OH. JACKSON sold the ATF UCAs four firearms ammunition, and firearms accessories for \$3260. JACKSON was driving a blue VW Atlas SUV bearing State of Ohio license plate JVCK which is registered to L. R. who has a listed address of 3XXX E. 116th St. Cleveland, Ohio. This is also the listed address for JACKSON. The firearms purchased included: Ruger, Model P94, .40 caliber-pistol, serial number 341-55400; a Smith & Wesson, Model M&P 40, .40 caliber pistol, serial number HLN4631; a Norinco, Model SKS, 7.62X39mm rifle, serial number 24001291; and an AR-15 style rifle, 5.56mm barrel.

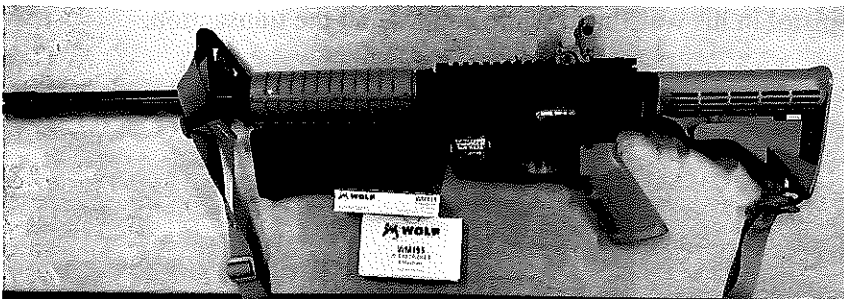
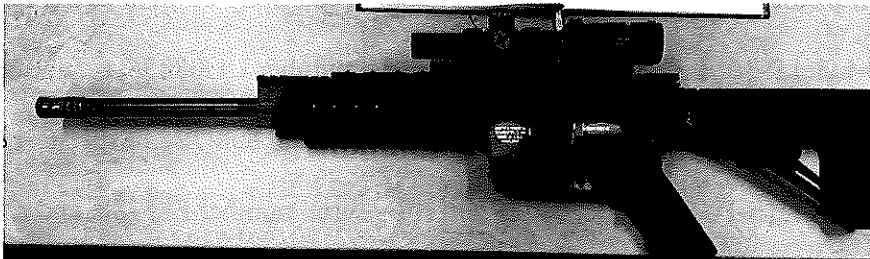


14. On July 10, 2023, two ATF UCAs met with JACKSON at 3273 Steelyard Dr., Cleveland, Ohio. JACKSON sold the ATF UCAs ten firearms, ammunition, and firearm accessories (holsters and magazines) for \$8000. The firearms purchased included: a Diamondback Firearms, Model DB15, Multi Cal-rifle (receiver), serial number DB2768103; a New Frontier Armory, Model C-4, Multi Cal-rifle (receiver), serial number CGH05579; a Palmetto State Armory, Model PSAK47, 7.62x39mm-rifle (receiver), serial number AHB025071; a Ruger, Model P89, 9mm-pistol, serial number 307-64300; a Smith & Wesson, Model SD9VE, 9mm-pistol (frame), serial number FWMxxxx (partially obliterated); a CZ (Česká zbrojovka), Model P-10M, 9mm-pistol (frame), serial number UG08856; a Taurus, Model G2C, 9mm-pistol, serial number TLS39386, a Taurus, Model 856UL, .38spl +P -revolver, serial number MC62187, a Hi-Point, Model 995, 9mm rifle, serial number F85788, and a Raven Arms, Model P-25, .25Auto-pistol (frame), serial number 088522. The UCA observed JACKSON carrying a pistol in his waistband while conducting the transaction.



15. On July 11, 2023, the Honorable U.S. Magistrate Judge James E. Grimes signed a Pen Register order allowing for the capture of real-time data associated with JACKSON's cellphone number 818-358-7004.

16. On July 13, 2023, two ATF UCA's met with JACKSON at 3273 Steelyard Dr., Cleveland, Ohio. JACKSON sold the ATF UCA's three firearms and ammunition for \$4500. The firearms purchased included a Smith & Wesson, Model M&P-15, 5.56mm-rifle (receiver), serial number TJ62190, a Smith & Wesson, Model M&P-15, 5.56mm-rifle (receiver), serial number TW05852, and a Tisas, Model 1911 A1 SS, .45Auto-pistol, serial number T0620-22Z45427.





17. On July 25, 2023, four ATF UCA's coordinated a purchase of four firearms from JACKSON for \$4300. The vehicle often operated by JACKSON, a red Jeep Cherokee (previously mentioned) arrived but JACKSON was not present. The UCA's met with an unknown male who sold them four firearms on-behalf of JACKSON. The unidentified male advised the UCAs that JACKSON was not present because his girlfriend was in the hospital but he still wanted the money for the firearms transaction. The purchased firearms included a Hi-Point, Model 4095, .40 caliber, serial number H59570, an American Tactical, Model Omni Hybrid, Multi-Cal rifle, serial number NS231104, a Springfield Armory, Model 1911 Garrison, .45 pistol, serial number NM732026, and a Ruger, Model PC Charger, 9mm pistol, serial number 913-57610.

18. On August 2, 2023, JACKSON contacted the ATF UCA and informed him that his firearms source of supply has not been responding to him. JACKSON informed UCA that he provided his source of supply \$8000 and stated "I paid him for that load you asked me for". JACKSON spoke to the UCA about attending a gun show together where JACKSON could

purchase firearms for the UCA. JACKSON told the UCA that he had two firearms in his possession that he would sell the UCA.

19. On August 3, 2023, three ATF UCA's met with JACKSON at 3400 Steelyard Dr., Cleveland, Ohio. JACKSON sold the ATF UCA one firearm, ammunition, and accessories for \$850. The purchased firearm was a Palmetto State Armory, Model Dagger, 9mm pistol, serial number JJE66626. JACKSON conversed with the UCA about future transactions and how to acquire firearms without his previous firearms source of supply. JACKSON mentioned attending gun shows with the UCA. JACKSON stated that he would purchase the firearms at the gun show on behalf of the UCA.




20. ATF S/A John Sabol, a firearms interstate nexus expert, examined all of the firearms purchased by ATF from JACKSON in the present investigation. S/A Sabol concluded that all the firearms purchased by ATF from JACKSON were manufactured outside the State of Ohio, and therefore affected and/or traveled in interstate commerce.

CONCLUSION

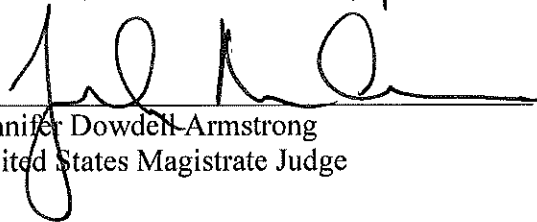
21. Therefore your affiant has probable cause to believe that violations of Title 18, United States Code, § 922(a)(1)(A) Engaging in the Business of Dealing Firearms without a License; Title 18, United States Code, § 922(a)(6), False Statement in Acquisition of a Firearm; and Title 18, United States Code, § 933, Trafficking in Firearms have been committed by Willie JACKSON.

Respectfully submitted,



Stephen McGrath
Special Agent
Bureau of Alcohol, Tobacco, Firearms, &
Explosives

This affidavit was sworn to by telephone after a PDF was transmitted by email, per Crim R. 41(d)(3) on this 9th day of August, 2023. at 1:07 p.m.



Jennifer Dowden-Armstrong
United States Magistrate Judge